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21 April 2017

BY ECF AND EMAIL

The Honorable Kiyo Matsumoto
United States District Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Evan Greebel, S1 15 Cr. 637 (KAM)

Dear Judge Matsumoto:

Pursuant to Paragraph 3 of the Court's January 13, 2017 Amended Criminal Pretrial Scheduling Order (Dkt. 147) (the "Amended Scheduling Order") and the April 20, 2017 Order, we respectfully submit a preliminary (a) proposed verdict form, (b) proposed voir dire, (c) proposed requests to charge, (d) list of trial exhibits, and (e) witness list by category.

These disclosures are preliminary because, among other things: We are continuing to review the discovery produced by the government, including the government's production on or about April 20, 2017; we anticipate that the government will produce additional discovery prior to trial; we anticipate that we may obtain discovery through subpoenas; we may re-evaluate our exhibits and witnesses based on our review of the government's exhibit and witness lists; and we will certainly re-evaluate our disclosures upon receipt and review of the government's production of material pursuant to Title 18, United States Code, Section 3500. Accordingly, we reserve all rights to supplement and amend our proposed verdict form, voir dire, requests to charge, list of trial exhibits, and witness list. Mr. Greebel further reserves the right to use any exhibits or call any witnesses identified by the government or Mr. Shkreli.

Pursuant to the Court's Amended Scheduling Order, we welcome the opportunity to meet and confer with the government to discuss our respective exhibit lists and witness lists, and to confer regarding potential stipulations.

Sincerely,
/s/ Reed Brodsky
Reed Brodsky

cc: All counsel (via ECF)